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July 1, 2016

**Via E-mail**

Hon. Richard J. Sullivan, D.J.  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2104  
New York, New York 10007  
([SullivanNYSDChambers@nysd.uscourts.gov](mailto:SullivanNYSDChambers@nysd.uscourts.gov))

**Re: Steven Jude Hoffenberg v. Jeffrey E. Epstein, et al. (Index No. 1:16-cv-03989)**

Dear Judge Sullivan:

We are counsel for the plaintiff, Mr. Steven Jude Hoffenberg, ("Plaintiff") in the above-referenced matter. We submit this letter on behalf of the Plaintiff, to withdraw his Complaint [Doc. 1], with prejudice, pursuant to FRCP 41(a)(2).

After consulting with the Plaintiff with respect to the issues raised in the Defendants' Letter dated June 28, 2016, the Plaintiff, in order to avoid needless litigation, believes that the individuals and entities which are victims of Tower Financial Corporation's "Ponzi" schemes set forth in the Complaint may be in a better position to pursue and assert their own claims against the Defendants, Mr. Jeffrey E. Epstein and The Financial Trust Company.

Respectfully submitted,

The Mintz Fraade Law Firm, PC

By:

  
Alan P. Fraade

APF/llk

Cc: Gary H. Baise, Esq.  
Mr. Steven Hoffenberg  
Bennet J. Moskowitz, Esq.